

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

<b>In Re:</b>	)	Chapter 11
	)	
<b>W.R. Grace &amp; Co., et al.,</b>	)	<b>Case No. 01-1139 (JKF)</b>
	)	<b>(Jointly Administered)</b>
	)	
<b>Debtors</b>	)	<b>Re: Docket Nos. 9301, 11023, 11403</b>

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**CHRIS PARKS & ASSOCIATES' CLAIMANTS' GENERAL OBJECTIONS AND  
RESPONSES TO DEBTORS' ASBESTOS PERSONAL INJURY QUESTIONNAIRE**

All Claimants represented by Chris Parks & Associates hereby make the following general objections to debtors' "standard questionnaire" to personal injury claimants:

1. Claimants object to the jurisdiction of this Court and that of the United States Bankruptcy Court for the District of Delaware. By filing these answers and objections, claimants do not submit to these Courts' jurisdiction, and reserve all objections to such jurisdiction.
2. Claimants object to the questionnaire to the extent that it seeks information broader or more extensive than that properly discoverable in the cases in the tort system in which claimants are seeking, or have sought, compensation for the injuries in question. Since state law governs claimants' claims, information that would not be discoverable under state law is likewise not discoverable in this proceeding.
3. Claimants hereby incorporate, as additional objections, all objections and arguments set forth in any other parties or committees' objections. Furthermore, Claimants hereby incorporate all objections and arguments set forth in the "General Objections to Claimant Discovery Questionnaire" attached to each Claimant's responses to said questionnaire, a copy of which is attached hereto as Exhibit "A."

4. Claimants object to the questionnaire pursuant to Fed.R.Civ.Proc. 26(b)(2), on the ground that it is unduly burdensome, and that the burden and expense of providing this information outweighs its likely benefit in any permissible bankruptcy estimation proceeding.

5. Claimants object to any part of the questionnaire that seeks production of confidential information such as settlements with other defendants.

Subject to and without waiving these objections, all Chris Parks & Associates' claimants have responded to the questionnaire by attaching medical records, social security records and other discovery products filed by claimant in the case filed by claimant in the tort system. All of the information within claimant's knowledge that is responsive to the questionnaire is contained in these documents. Cf. Fed.R.Civ.Proc. 33(d) and 26(b)(2). These responses were submitted to the Claims Processing Agent.

Dated: July 12, 2006.

Respectfully submitted,

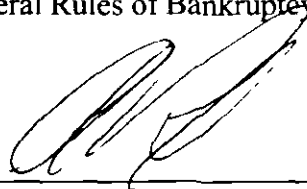
CHRIS PARKS & ASSOCIATES  
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Port Arthur, TX 77642  
409/985-5000 - telephone  
409/985-2883 - fax

BY: \_\_\_\_\_

Chris Parks/  
Texas Bar No. 15518460

**CERTIFICATE OF SERVICE**

I certify that a true copy of the above and foregoing document was electronically filed with the Court and served on all known counsel of record on the 12<sup>th</sup> day of July, 2006 via the Court's Electronic Case Filing System in accordance with the Federal Rules of Bankruptcy Procedure and the local rules.

A handwritten signature in black ink, appearing to read "Chris Parks", is written over a horizontal line.

Chris Parks